



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

May 30, 1985



Mr. Vincent McQuiggin, Project Coordinator  
Pacific Wood Treating Corporation (PWT)  
111 West Division Street  
P. O. Box 518  
Ridgefield, Washington 98642

Dear Mr. McQuiggin:

Dangerous Waste (DW) Regulations (Chapter 173-303 WAC)  
Inspection Conducted on April 25, 1985 Pacific Wood Treating  
Corporation, Ridgefield Brick and Tile Site (RBT),  
EPA/State ID #WAD 009036906

Thank you for the cooperation provided to me during my recent inspection of the Pacific Wood Treating Corporation's (PWT) Ridgefield Brick and Tile (RBT) land disposal site located at 3510 N.W. 289th Street, Ridgefield, Washington. Those present during the April 25, 1985 inspection were yourself of PWT, Debbie Uskoski of PWT, Randy Sweet of Sweet, Edwards and Associates, Inc. (present during part of the inspection), and myself of the Washington State Department of Ecology (WDOE). The Dangerous Waste (DW) Regulations compliance inspection consisted of completion of the compliance checklist/questionnaire (enclosed) and a field inspection of the PWT/RBT facility. I also conducted an evaluation of the PWT/RBT file documents of the WDOE. The results of this evaluation are as follows.

The PWT/RBT facility consists of an inoperative 175.8 by 169.4 feet lined, capped, and monitored DW landfill which was closed under the close supervision of the WDOE and the U.S. Environmental Protection Agency (EPA) via such mechanisms as WDOE Order No. DE 83-468 (dated October 26, 1983) and Notice of Penalty No. DE 83-284 (dated June 20, 1983). EPA's comments on the PWT/RBT Draft Closure and Post-Closure Plan for the Ridgefield Brick and Tile Site (as dated July 15, 1983) were provided in an August 10, 1983 letter to Eric Egbers of the WDOE from Kenneth D. Feigner, Chief, Waste Management Branch, U.S. EPA. This letter stated, in part, that the "plan is generally comprehensive and well done" and that "EPA is willing to accept, however, an environmentally sound closure alternative" (i.e. an alternative to an interim status facility closure) "that includes measures equivalent to the interim status closure and post - closure requirements...." The results of my compliance inspection lead me to conclude that the facility appears to have been conscientiously closed per the aforementioned closure agreements and that post-closure commitments are being met with the following exceptions:



# ROUTING AND TRANSMITTAL SLIP

Date

6/14/85

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. Marcia B.

2. Review attached report

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	<input checked="" type="checkbox"/> For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

Also, please check to see if Bob's report is in (+ MEC).

Looks to me like:

1. Samples are showing contam. (p. 2)
2. Did not assess GW network

Make recommendation for retraction.

Thank

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

114 DM Stammers  
US EPA, Region X  
1200 Sixth Ave  
Seattle, WA 98101

DEPARTMENT OF ECOLOGY—ROUTER

	TO	INITIAL	DATE
1.	<del>Bob Stammers</del>		
2.	<del>Helen Fyfe</del>		
3.	<del>Pete Action</del>		
4.	Marcia.		
5.			

APPROVAL	PREPARE REPLY FOR DIRECTOR
REVIEW AND COMMENT	SIGNATURE
NECESSARY ACTION	SEE ME
ACKNOWLEDGE	AS REQUESTED
NOTE AND RETURN	FOR YOUR INFORMATION
INITIAL FOR CLEARANCE	FILE

REMARKS OR ADDITIONAL ROUTING

Check - my my my! Does not address  
GWM network design nor the HCIC in  
terms of cto post closure plan or ACL.  
LJ

FROM Janice C. Chance DATE 5-30-85

40 CFR 265.145 - Financial Assurance for post-closure monitoring and maintenance

Although PWT applied in 1983 for post closure insurance with the Fred S. James Insurance Company of Portland, Oregon, it has not been successfully obtained. Per 40 CFR 265.145, please obtain post closure insurance by September 1, 1985 and submit evidence of its procurement to me immediately thereafter. I have enclosed a copy of Wording of Financial Instruments Required by WAC 173-303-400 and 173-303-620 for Dangerous Waste Facilities, WDOE Hazardous Waste Section, July 1, 1984 for your utilization. In addition, please complete the enclosed Certification of Compliance by September 1, 1985 and return it to me.

Facility Maintenance

It is my understanding that the alleged cattle break-in onto the actual disposal site consisted of one instance which occurred at least a year ago during which time a cow(s) broke through an out lying fence. This problem was promptly solved via the installation of a new barbed wire fence immediately adjacent to the perimeter of the buried wastes.

My infield inspection revealed that run-on, run-off, and direct precipitation onto the site is controlled and diverted via the landfill cap, a thick grass cover, and the three perimeter rock lined ditches. A surface crack which developed immediately outside the eastern site boundary during December 1983 was filled with bentonite and re-vegetated. It was no longer in evidence, and analyses of toe drain samples collected during and immediately after the crack's development indicated naphthalene, pentachlorophenol, and arsenic levels well below the values stipulated in WDOE Order DE 83-468.

Groundwater, Lysimeter, and Toe Drain (Leachate) Sampling

The 1984 annual summary and statistical analysis of water quality data (as dated January 9, 1985) collected at the PWT/RBT site revealed that:

1. WDOE DE 83-468 stipulated concentrations of arsenic (one half drinking water standards), pentachlorophenol and naphthalene (one-half the acute freshwater aquatic life toxicity criteria) are consistently being met.
2. The major parameters of concern per the WDOE DE 83-468 are often at less than detectable levels.
3. Per 40 CFR 265.93 statistical methods, there was no significant increase of downgradient water quality parameters over background values.

The waste in the PWT/RBT site consists of woodwaste (approximately 95%) and ash from the incineration of the sludge resulting from the treatment of the wastewater of a wood treating industry which utilizes pentachlorophenol and

creosote (K001). Only one fraction of the bag house ash was a DW due to its EP toxicity for arsenic (D004). All of the aforementioned factors lead me to conclude that the PWT/RBT site appears to constitute a properly closed and managed land disposal facility of minimal potential environmental hazard.

#### Additional Documentation

Although not a requirement, I have the following suggestions for clarifying facility management and closure status in the future.

1. Annually collect and analyze a sample from the underdrain sump instead of one of the two toe drain samples (distribution box or sump).
2. Attempt to develop a record of toe drain and underdrain flow quantities ( $\pm 20\%$ ).
3. Include a site map with the ground water monitoring report which indicates the well and lysimeter sampling locations as identified in the laboratory reports (i.e. Muffet, Rutkowski, etc.) and distances to said sample collection points. (All other maps identify wells by number rather than owner). In addition, correct the error on Page 16 of the draft closure/post closure plan which states that the back-ground lysimeter is located to the northeast (should state southeast.)
4. Incorporate a figure illustrating the existence of the perforated underdrain pipes in the Certification of Closure document (Wicks, February 15, 1984).
5. Where available, incorporate the following into the Certification of Closure document's drawings (i.e. figure entitled Final Closure Layout, revised 5/9/84).
  - a. finished surface contours (over refuse itself)
  - b. bottom liner slope
  - c. slopes and elevations of underdrain, toe, and two tight lines to sumps
  - d. procedures used to insure 95% relative compaction of cover material at specified thickness (1.5 feet)
  - e. drawing indicating relocation of toe drain into refuse mass per reviewer's comments
  - f. site fencing improvements

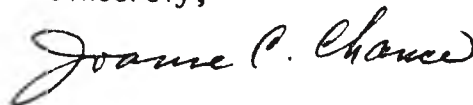


Vincent McQuiggen  
May 30, 1985  
Page 4

6. Does Figure 10 (revised 8/19/83) of the Addendum to Draft Closure and Post Closure Plan accurately reflect the lysimeter locations? A map indicating the number assigned to each lysimeter is needed in reference to sampling results provided in the monitoring report.
7. The figure entitled Final Closure Layout (revised 5/9/84) indicates that surface runoff, (i.e. from rock lined open channel) flows to sumps. Based on my knowledge, this is not true. Please address.
8. The post closure plan should address inspection of lines for solid's deposition and procedures for cleanout of lines (perforated and non-perforated) where feasible. Please submit a copy of your entire post closure inspection checklist to me by September 1, 1985 and indicate such compliance on the enclosed Certificate of Compliance.

I look forward to your timely submittal of the aforementioned documentation of post closure insurance and inspection. Please contact me at (206) 753-8532 if you have any questions or concerns.

Sincerely,



Joanne C. Chance  
Hazardous/Solid Waste Engineer

JC:pw(1/4)

Enclosures

Wording of Financial Instruments  
Compliance Checklist  
Certification of Compliance  
Copies of prior orders (2)

cc: Tom Cook, WDOE/with checklist  
Janice Kelley, WDOE/with certification  
Bob Stamnes, EPA/with checklist

Please complete and return this form to Joanne C. Chance, Washington Department of Ecology, Southwest Regional Office, 7272 Cleanwater Lane, Mail Stop LU-11, Olympia, Washington 98504, by September 1, 1985.

CERTIFICATE OF COMPLIANCE

As a legal representative of Pacific Wood Treating, I certify that to the best of my knowledge, the compliance status at our hazardous waste facility located at 3510 Northwest 289th Street, Ridgefield, Washington, Facility I.D. No. WAD009036906 is as shown below.

<u>Items of Noncompliance</u>	<u>Category I, II, III</u>	<u>Compliance Date</u>	<u>Compliance Status (Check One)</u>		<u>Comments</u>
			<u>Complied</u>	<u>Not Complied</u>	
40 CFR 265.145	III	9/1/85			
Post-Closure Inspection Checklist	III	9/1/85			

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed Name)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

RCRA/WAC 173-303 DANGEROUS WASTE  
COMPLIANCE CHECKLIST/QUESTIONNAIRE

Industry name and address:

Date: April 25, 1985

Pacific Wood Treating Corp. (PWT)  
Ridgefield Brick and Tile (RBT)

111 West Division St

PO Box 518

Ridgefield, WA

County: Clark

Zip: 98642

EPA/State Identification Number:

WAD 009036906

Telephone: (206) 887-3562

Physical Location of Facility (if different than above):

3510 NW 289th Street, Ridgefield

Facility Contact(s) Present During Inspection		
Name	Title	Phone No.
<u>Vincent McQuiggin</u>	<u>Project Coord.</u>	<u>(503) 287-2411</u>
<u>Debbie Uskoski</u>	<u>Environmental Assistant</u>	<u>(206) 887-3562</u>
<u>Randy Sweet</u>	<u>Hydrogeologist</u>	<u>(206) 423-3580</u>

(present during party time)

Inspected by:

Joanne C. Chance  
(Printed)

753-8532  
(Phone Number)

I. Notification, Part A and Core Information

- Notification filed: yes Date: 5/19/83 amended
- Part A application filed: yes Date: 5/19/83 amended
- Classified as: Generator ☐ Disposal facility ☒  
Transporter ☐ Transfer facility ☐  
Treatment facility ☐ Recycler ☐  
Storage facility ☐ Other ☐

Comments:

Facility consists of a closed

land disposal facility (175.78' x 169.4')  
(land fill)



4. Have any changes in Notification or Part A been filed? yes Date(s): 5/19/83\*
5. Does facility generate a solid waste(s) or receive a solid waste as defined by WAC 173-303-040? not now  
ceased Jan. 24, 1983
6. Is this waste(s) designated under WAC 173-303, and not RCRA? no
7. Under what section, in WAC 173-303, are waste(s) designated?
- a. Discarded Chemical Products (081) \_\_\_\_\_
  - b. Dangerous Waste Sources (082) ✓ K001
  - c. Dangerous Waste Mixtures (084) \_\_\_\_\_
  - d. Toxic Dangerous Wastes (101) \_\_\_\_\_
  - e. Persistent Dangerous Wastes (102) \_\_\_\_\_
  - f. Carcinogenic Dangerous Wastes (103) \_\_\_\_\_
  - g. Dangerous Waste Characteristics (090) \_\_\_\_\_
    - (1) Ignitability \_\_\_\_\_
    - (2) Corrosivity \_\_\_\_\_
    - (3) Reactivity \_\_\_\_\_
    - (4) EP Toxicity ✓ D004

Remarks: \* PWT originally made some errors on their initial notification and part 2 for their "

- West Division Street facility. This initial notification made reference to the RBT site in a minor way.
8. Dangerous Wastes listed on Part A application, or for generators, dangerous wastes generated.

D.W. No.	Amount	Waste Description	Disposal Method
a. <u>K001</u>	<u>190-240 Tons</u>	<u>furnace bottom, multi-cine</u>	<u>ash was mixed with ~95%</u>
b. _____	_____	<u>and bag house</u>	<u>wood yard</u>
c. _____	_____	<u>ash from waste</u>	<u>waste and</u>
d. _____	_____	<u>wood boiler</u>	<u>buried</u>
e. _____	_____	<u>plant contamination with residue</u>	_____
f. _____	_____	<u>from burning of</u>	_____
g. _____	_____	<u>K001 sludge and through system upset, CCA sludge*</u>	_____

\* wastewater slurry was sprayed on wood waste and burned  
 \* treated wood burned  
 \* upset (pentachlorophenol) creosote

9. Have these wastes been analyzed for determination of degree of hazard? ✓

If so, by whom?

Ash was analyzed and failed due to EP toxicity (arsenic) <sup>①</sup>

10. Has facility petitioned, through RCRA 260.22 or WAC 173-303-910(3), to remove designation from a waste? \_\_\_\_\_

If yes, explain:

started but stopped due to arsenic levels being identified

11. This facility: ☐ Complies ☒ Does not comply with Interim Status Standards.

Comments:

① One test on one Fraction of ash failed - baghouse ash which catches fines from the incinerator

Facility does not comply due to financial assurance for post closure. This is the only reason it is not in compliance.

Signature of Inspector: \_\_\_\_\_

Jeanne C. Chance

II. Standards Applicable to GENERATORS of Dangerous  
Waste - RCRA 262/WAC 173-303-170 to 230

	<u>Yes</u>	<u>No</u>
1. Does generator transport its own waste?		
a. Is waste ever given to "outside" contractor?		
EPA/State I.D. No:		
(Contractor(s))		
Name and address:		
Note: (If facility transports own waste, look at standards applicable to transporters, section III)		
2. Is generator following RCRA/WAC 173-303 manifest system?		
a. Is signature of, and date of acceptance by transporter obtained prior to transport?		
b. Does generator retain one copy of manifest in accordance with WAC 173-303-180(3), Manifest Procedures?		
c. Are manifests (signed by the generator, transporter, and designated disposal facility) kept for a minimum of three years (WAC 173-303-210(1))?		
3. Does generator operate a specific area for container handling or storage?		
If yes, describe: _____		
_____		
a. Does generator comply with the requirements set forth in WAC 173-303-200 governing on-site waste accumulation:		
(1) Labeling and marking		
(2) Dating		
(3) Inspections (must be done weekly for containers) WAC 173-303-630(8)?		

Yes No

- b. Are incompatible wastes or other materials segregated? NA
4. Is entity familiar with Generator Reporting Procedures, (WAC 173-303-220)?
- a. Annual Reports (WAC 173-303-220(1))
- b. Exception Reports (WAC 173-303-220(2))
- c. Spills and Discharges into the Environment (WAC 173-303-145)
5. Is generator aware of and complying with regulations concerning the preparation of Dangerous Waste for transport?
- a. Packaging: 49 CFR 173, 178, 179, and with requirements of UTC and WSP
- b. Labeling: 49 CFR 172
- c. Marking: 49 CFR 172
- d. Placarding: 49 CFR 172 Subpart F

NOTE: Containers with  $\leq$  110 gallons of Dangerous Waste must be marked with the following or essentially equivalent, words and information, displayed in accordance with 49 CFR 172.304:

DANGEROUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the U.S. Environmental Protection Agency.

Generator's Name and Address

\_\_\_\_\_  
\_\_\_\_\_

Manifest Document No. \_\_\_\_\_

Comments: \_\_\_\_\_

Yes   No

6. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered (WAC 173-303-120)?

NA

a. If yes, what are they? \_\_\_\_\_

- b. Do they exhibit any of the Dangerous Waste characteristics?

Note: If not, they are regulated.

7. Does generator store dangerous waste over 90 days for either transport, treatment or disposal?

If yes, what are they? \_\_\_\_\_

(if yes, go to IV, Standards for TSD Facilities)

8. Does generator follow the operating procedures for containers as outlined in WAC 173-303-160, containers?

i.e. Triple rinsing, resulting in less than 1% volume or 1 inch product remaining.

9. Preparedness and Prevention (WAC 173-303-200(6)).

a. Is an emergency communication system readily available in areas where wastes are stored or handled (WAC 173-303-340)?

b. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment readily available (WAC 173-303-340(1)(c))?

c. Have arrangements been made with local police, fire departments, and emergency response teams to familiarize them with the facility layout and the properties of the dangerous wastes handled (WAC 173-303-340(4))?

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Yes    No

10. Contingency Plan and Emergency Coordinator  
(WAC 173-303-200(6)).

- a. Does the facility have a Contingency Plan which is designed to minimize the consequences of any unplanned release of Dangerous Waste (WAC 173-303-350)?
- b. Does the facility have an Emergency Coordinator, and if so, their name \_\_\_\_\_
- c. Is this Emergency Coordinator, or his designee, familiar with the requirements stated in WAC 173-303-360, Emergencies?
- d. Does contingency plan contain a list of all emergency equipment, its location(s), and a brief outline of its capabilities (WAC 173-303-350(3)(e))?

If not, explain: \_\_\_\_\_

11. Personnel Training (RCRA 262.34(a)(5))

- a. Does facility have a training program that instructs facility personnel in such a way that ensures compliance with RCRA and WAC 173-303?
- (1) Do facility personnel participate in an annual review of the training provided in the training program?
- (2) Does the program include training in the following areas, where applicable?
- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.
- (b) Key parameters for automatic waste feed cut-off systems.
- (c) Communications or alarm systems.
- (d) Response to fire or explosions.
- (e) Response to ground water contamination.
- (f) Shut down of operations.



Yes    No

b. Does facility have a written training plan which includes the following documents and records:

- (1) For each position related to dangerous waste management; the job title, job description (including qualifications), and the name of the employee.
- (2) A written description of the type and amount of both introductory and continuing training for that position.
- (3) Records documenting that facility personnel have received and completed the training required by WAC 173-303-330.

NA

Comments:

RCRA/WAC 173-303 DANGEROUS WASTE

COMPLIANCE CHECKLIST/QUESTIONNAIRE

III. Standards Applicable to TRANSPORTERS of Dangerous Waste,  
RCRA 263/WAC 173-303-240 to 270

	Yes	No
1. Does transporter have an EPA/state identification number?		<input checked="" type="checkbox"/>
2. Is transporter aware of, and complying with manifest requirements under RCRA 263.20 and WAC 173-303-180?		
a. Before transporting a Dangerous Waste does transporter date and sign manifest?		
b. Does transporter return a signed copy of manifest to generator?		
c. Does transporter retain one copy of the manifest after delivery in accordance with WAC 173-303-260?		
d. Does the transporter give the remaining copies of the manifest to the accepting transporter or designated disposal facility?		
e. Does transporter obtain a signature of next transporter or designated facility?		
f. Is the generator notified if the waste (or part of it) cannot be delivered to the assigned site?		
g. Are manifests (signed by the generator, transporter, and designated disposal facility) kept for a minimum of three years (WAC 173-303-160(1))?		
Comments:		

Yes   No

3. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in RCRA 263.30 and WAC 173-303-270, discharges during transport?

a. Give notice to generator?

b. Give notice to the National Response Center (800-424-8802) if required by 49 CFR 171.15?

c. Report in writing, as required by 49 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. 20590.

Comments: \_\_\_\_\_

RCRA/WAC 173-303 DANGEROUS WASTE  
COMPLIANCE CHECKLIST/QUESTIONNAIRE

IV. Standards Applicable to Dangerous Waste TREATMENT, STORAGE and DISPOSAL Facilities, WAC 173-303-280 to 395

- |  | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| 1. Has facility obtained an EPA/state identification number?   | ✓          | _____     |
| 2. Are dangerous wastes accepted from "outside" sources (wastes not generated on site)?  | _____      | ✓         |
| a. If yes, has a chemical and physical analysis of a representative sample been obtained in accordance with RCRA 265.13 and WAC 173-303-300?   | NA         |           |
| b. Does the facility confirm that each Dangerous Waste received at the facility matches the identity of the waste on the manifest?   | N/A        |           |
| 3. Has facility obtained a detailed chemical, physical, and/or biological analysis of his waste prior to storing, treating, or disposing of it (WAC 173-303-300(2))?                                   | _____      | ✓*        |
| Describe: <u>* facility is closed during its life it accepted off-site waste from PWT when owned by Muffet. PWT bought property during closure and did not dispose of DW at the site after 1/24/83</u> |            |           |
| 4. Does the facility follow a Written Waste Analysis Plan containing:  |            |           |
| a. Parameters to be tested?  |            |           |
| b. Methods of analysis?  | NA         |           |
| c. Methods to obtain representative samples?   |            |           |
| d. Testing frequency?  |            |           |

Comments: \_\_\_\_\_

\* WDOE ash sample was only analysis done on waste

Yes No

5. Security

- a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry?
- (1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by any approach?
- (2) Are they legible from a distance of 25 feet or more?
- (3) Does the facility have a 24-hour surveillance system or Artificial or natural barrier/or combination of both, to control access to the active portion?
6. Are incompatible wastes segregated to ensure against accidental ignition, fuming, etc. (WAC 173-303-395)?
- a. Are ignitable or reactive wastes kept a minimum of 50 feet away from the site property line?
- b. Is this compliance with WAC 173-303-395 documented in the operating record?
- c. Are yearly inspections carried out where ignitable or reactive wastes are stored?
- d. Is their inspector familiar with the Uniform Fire Code, or is he a local, state, or Federal Fire Marshal?

barbed wire

not active

NA

NA

NA

Comments:

one instance of a cow(s) breaking through fence onto DW facility field. Hot marks en. Problem solved by installing a barbed wire fence around actual DW site. No cows on DW site since (at least one year ago).

- |   | <u>Yes</u>                          | <u>No</u>                |
|---|-------------------------------------|--------------------------|
| 7. Has the facility a written inspection schedule (RCRA 265.15/WAC 173-303-320(2))?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a. Does it include inspecting all:  |                                     |                          |
| Monitoring equipment?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Safety and emergency equipment?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Security devices?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Detection equipment?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Dangerous waste storage areas?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Is this inspection schedule maintained at the facility? <i>(Schedule maintained at IIIW Division ST DWT facility)</i>          | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Is an inspection log maintained?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? <i>@ IIIW Division</i> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

8. Operating Record

- |  |                                     |                          |                         |
|--|-------------------------------------|--------------------------|-------------------------|
| a. Does the owner/operator of the facility maintain an operating record at the facility (RCRA 265.73/WAC 173-303-380))?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <i>not in operation</i> |
| b. Does the record contain the following information:  |                                     |                          |                         |
| (1) A description of, and the quantity of each Dangerous Waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <i>N/A</i>              |
| (2) The location of each Dangerous Waste within the facility, and its quantity?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                         |
| (3) A map showing disposal sites?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                         |
| (4) Summary reports and details of all incidents that require implementing the Contingency Plan?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                         |

Comments: \_\_\_\_\_



Operating Record (Continued)

Yes No

- (5) Records and results of inspections as required by WAC 173-303-360(2)(d), General Inspection (need only be kept three years)?
- (6) All closure and post-closure cost estimates required for the facility?
- (7) The results of testing and waste analysis?

N/A

✓

9. Facility Reporting Procedures (WAC 173-303-390)

- a. Has the owner/operator prepared and submitted a single copy of the Annual Report to the WDOE by March 1 of each year?  
(The report form and instructions in Facilities Report Form - Part B must be used for this report, and is available from the department.)
- b. Is owner/operator familiar with requirements for unmanifested reports, if applicable?
- c. Is owner/operator familiar with procedures for emergencies (WAC 173-303-360(2))?

✓

N/A

N/A

10. Closure and Post-Closure

- a. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility (RCRA 265.112)?

✓ \*

Does it contain the following:

- (1) A description of how and when the facility will be partially closed (if applicable) and finally closed?
- (2) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?
- (3) A description of the steps needed to decontaminate the facility equipment during closure? *contractor equipment*

✓

✓

✓

Comments:

*Site closed Oct 17, 1983.*

*\* closure plan implemented after approval by WDOE and EPA review*

*\* implementing post closure plan now (was implemented immediately after closure)*

Yes No

11. Financial Requirements (RCRA 265.140)

- a. Has owner/operator prepared a written estimate of the cost of closing the facility in accordance with the closure plan (RCRA 265.112)?

✓

- (1) Is this cost estimate annually adjusted?

N/A

- b. Has owner/operator established financial assurance for the closure of the facility (RCRA 265.143)?

N/A

- (1) By what method has this been achieved:

- a. Trust fund  
b. Surety bond  
c. Letter of credit  
d. Insurance  
e. Financial test or corporate guarantee  
f. Multiple mechanisms

*closed and paid for*

if so, state methods used

N/A

- (2) Has owner/operator submitted a copy of financial assurance to Regional Administrator (or WDOE)?

N/A

- (3) Is wording of the financial assurance statement identical to that specified in RCRA 264.151 (a) (1) Trust fund

- (b) Surety bond  
(c) Letter of credit  
(d) Insurance  
(e) Financial test  
(f) Corporate guarantee  
265.143 (g) Multiple Financial Mechanism

N/A

Note: (Ask for copy of assurance statement if department does not have one.)

- c. Has the owner or operator of the Hazardous Waste treatment storage, or disposal facility obtained and maintained liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million?

N/A

Yes No

- d. Has the owner or operator of the Hazardous Waste treatment, storage, or disposal facility obtained and maintained liability insurance for nonsudden occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million?

NA

12. Financial Requirements for Post-Closure Care (RCRA 265.144)  
(Disposal Facilities Only)

- a. Has owner/operator prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (RCRA 265.144)?

✓

(1) Is this cost estimate annually adjusted?.

✓ by implementation

- b. Has owner/operator established financial assurance for the post-closure care of the facility (RCRA 265.145)?

(1) By what method has this been achieved:

- a. Trust fund \_\_\_\_\_  
b. Surety bond \_\_\_\_\_  
c. Letter of credit \_\_\_\_\_  
d. Insurance \_\_\_\_\_  
e. Financial test or corporate guarantee \_\_\_\_\_  
f. Multiple mechanisms \_\_\_\_\_

if so, state methods used \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

applied with  
Fred S. James  
Insurance Co.  
111 SW Columbia  
Portland  
for post  
closure  
insurance  
applied  
before  
closure  
was even  
complete

Comments:

\* Cost was \$44430 in 1983 dollars; it  
is annually adjusted since post closure plan is  
implemented each year

Yes   No

(2) Has owner/operator submitted a copy of financial assurance to Regional Administrator (or WDOE)?

*not yet*

(3) Is wording of the financial assurance statement identical to that specified in RCRA 264.151 (a) (1) Trust fund

*not yet \**

(b) Surety bond

\_\_\_\_\_

(c) Letter of credit

\_\_\_\_\_

(d) Insurance

\_\_\_\_\_

(e) Financial test

\_\_\_\_\_

(f) Corporate guarantee

\_\_\_\_\_

265.145 (g) Multiple Financial Mechanism

\_\_\_\_\_

(4) Has owner/operator satisfied the financial assurance requirements by using a mechanism that takes into account both closure and post-closure care (RCRA 265-140)?

if so, state method(s) used \_\_\_\_\_

*only post closure is applicable*

Comments:

*Send a copy of Wording of Financial Instruments*

Yes   No

13. Management of Containers (RCRA 265.170/WAC 173-303-630,  
Final Status)

- a. Are container storage areas inspected weekly for leaks and container deterioration (RCRA 265.174)?
- b. If systems are uncovered, do they have positive drainage control and sufficient capacity to contain 110 percent of the volume of the largest container, (final status)?
- c. If the facility stores EHW, is it protected from the elements by means of a building or other protected covering (final status)?
- d. Are containers marked or labeled in a manner equivalent to 49 CFR 172 subpart E?

*[Handwritten signature/initials]*

Comments: \_\_\_\_\_

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Yes    No

14. Tanks (RCRA 265.190)

a. Do tanks on the facility hold DW or EHW?

If so, what are their contents? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

b. If applicable, are tanks protected from accelerated corrosion, erosion, or abrasion through the use of:

Inner liners \_\_\_\_\_

Coating \_\_\_\_\_

Other \_\_\_\_\_

c. Are Dangerous Waste storage tanks operated in a manner which minimizes the possibility of overfilling?

How:

Waste feed cut-off \_\_\_\_\_

Bypass system to another tank \_\_\_\_\_

High level alarm \_\_\_\_\_

Other \_\_\_\_\_

d. Are tanks used for holding Dangerous Waste inspected on a routine basis (RCRA 265.194)?

For:

Overfilling equipment \_\_\_\_\_ once/day

Monitoring equipment \_\_\_\_\_ once/day

Tank integrity (above ground) \_\_\_\_\_ once/week

e. Are tanks cleaned of all dangerous waste prior to being taken out of service or re-use?

Comments: \_\_\_\_\_

Sumps are tank like but leachate  
is not DW



Yes No

15. Surface Impoundments

- a. Are the surface impoundments designed and operated to allow two feet of freeboard?

If not, explain \_\_\_\_\_

- b. Is there a leachate detection, collection and removal system for impoundment?

- c. Does the surface impoundment contain a liner system to prevent discharge into the land during the life of the impoundment?

If so, what type \_\_\_\_\_

- d. Are the surface impoundments so located to meet the buffer zone requirements of WAC 170-303-520?

- e. Are earthen dikes kept free of perennial woody plants and burrowing animals?

- f. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)?

- g. Are the surface impoundments inspected on a routine basis?

(1) Surface impoundments carrying free liquids \_\_\_\_\_ once/day

(2) Surface impoundments including dikes, berms, and vegetation \_\_\_\_\_ once/week

- h. Are ignitable or reactive wastes held in a surface impoundment (RCRA 265.229)?

Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

16. Waste Piles (RCRA 265.250)

Yes    No

- a. Are dangerous wastes held in piles?

If yes, describe \_\_\_\_\_

- b. Is the waste pile(s) designed to prevent wind or water dispersion (where applicable)?

- c. Is leachate or run-off dangerous per WAC 173-303?

If so, what are its properties? \_\_\_\_\_

- (1) Is run-on diverted from waste pile(s)?

- (2) Do waste pile(s) have a containment system?

- (3) Does containment system consist of leachate and run-off collection and control system?

If yes, describe: \_\_\_\_\_

- (4) Is leachate treated and/or discharged via point source?

How is it treated? \_\_\_\_\_

- (5) Is the base of the pile lined or is it located on an impermeable base?

- d. Are ignitable, reactive, or incompatible wastes held in waste piles?

If so, refer to RCRA 265.256 and 265.257.

Comments: \_\_\_\_\_

17. Land Treatment (RCRA 265.271/WAC 173-303-400(3)(iv))

Yes      No

- a. Are dangerous wastes treated through land farming?

If yes, describe: \_\_\_\_\_

- b. Has waste analysis been done (RCRA 265.13)?

- c. Is analytical data covering land farmed dangerous waste available?

(1) Does this information include metals data relating to the EP toxicity test (RCRA 265.273(a))?

- d. Are all dangerous land farmed wastes treatable?

- e. Is run-on diverted away from the active portions of the land farm?

- f. Is run-off from active portions:

Collected? \_\_\_\_\_ Treated? \_\_\_\_\_

- g. Are food chain crops grown on the land farm?

If yes, describe: \_\_\_\_\_

- h. Are records kept which state application dates, rates, quantities, and location of each dangerous waste in the land farm?

- i. Does the owner/operator have a written and active unsaturated zone monitoring plan (RCRA 265.278)?

(1) Does this plan:

(a) Detect the vertical migration of hazardous waste and hazardous waste constituents under the active portion of the land treatment facility?

(b) Provide information on the background concentrations of the hazardous waste and hazardous waste constituents in similar but untreated soils nearby?

Yes    No

(2) Is the owner/operator familiar with the requirements of this plan set forth in RCRA 265.278?

Comments: \_\_\_\_\_

*N/A*

Yes No

18. Landfills (RCRA 265.300/WAC 173-303-400(ii), also applies to waste piles used as a disposal site)

a. Are dangerous wastes disposed of by landfill?

✓

If yes, describe: in past ash was buried in landfill

b. Is owner/operator familiar with WAC 173-303-400(3)(c)(ii)?

✓

"An owner/operator shall not landfill an organic carcinogen or an extremely hazardous waste, except at Hanford"

c. Is run-on diverted away from the landfill?

✓\*

d. Is run-off collected from the landfill? no but heavy cover is adequate; did not

✓\*\*\*

(1) Is run-off from the landfill a designated waste?

✓\*\*\*

If so, how is it treated? N/A

e. Is a detailed map of the fill maintained which identifies the location of the dangerous waste?

✓

f. Has the owner/operator reviewed closure/post-closure regulations (RCRA 265.310) e.g. final cover, erosion and infiltration control?

✓

g. If liquid wastes are placed in landfill, is the owner/operator fully aware of the requirements set forth in RCRA 265.314?

N/A

observe erosion problems on cover

Comments:

\* run-on diverted by impermeable cap and 3 surrounding rock lined ditches. Landfill is well vegetated

\*\* leachate collection lines collect leachate and carry to sump (to drain and under drains)

\*\*\* laboratory analysis shows leachate is usually below lower detection levels is below DW-83-468 criteria is not a Dangerous Waste

19. Ground Water Monitoring (RCRA 265.90/  
WAC 173-303-400(3)(c)(v))

- Describe: \_\_\_\_\_

- d. Has a written well monitoring program been developed (RCRA 265.92)?

- (1) At what frequency are samples collected for:

- (a) Ground water quality ✓ annually *now*  
(b) Ground water contamination semiannually

- e. May the department have a copy of your ground water monitoring plan?

Comments:

Dec 83 - Dec 84: quarterly collection  
1985 - on annual basis for  
30 years



20. Incinerators (RCRA 265.340)

- |   | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| a. Are dangerous wastes disposed of via incinerators?   | _____      | _____     |
| b. Is the incinerator brought up to a steady state condition prior to adding waste?   | _____      | _____     |
| c. Are records of operation kept?   | _____      | _____     |
| d. How often is waste analysis conducted to verify that the waste feed to the incinerator is within the physical and chemical composition limits specified in the permit? _____ | _____      | _____     |
| e. Does the owner/operator have a written inspection plan?  | _____      | _____     |

If so, does it include the following?

- (1) Combustion controls \_\_\_\_\_ 15 minutes during incineration (RCRA 265.347(a)(1)).
- (2) Temperature, wastefeed rate, airfeed rate \_\_\_\_\_ continuous.
- (3) Plume \_\_\_\_\_ hourly.
- (4) Complete incinerator and associated equipment \_\_\_\_\_ daily.

Comments: \_\_\_\_\_

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Yes No

21. Thermal Treatment (RCRA 265.370)

- a. Do dangerous wastes undergo thermal treatment? \_\_\_\_\_

If so, specify: \_\_\_\_\_

- b. Is the thermal treatment system brought up to a steady state condition using auxiliary fuel? \_\_\_\_\_

- c. Does the owner/operator have a written inspection schedule? \_\_\_\_\_

- d. Is the treatment unit inspected during operation in accordance with RCRA 265.377? \_\_\_\_\_

Does he inspect the:

- (1) Operating controls every 15 minutes? \_\_\_\_\_

- (2) Stack plume emissions every hour? \_\_\_\_\_

- (3) Complete unit daily? \_\_\_\_\_

22. Underground Injection (RCRA 265.430/  
WAC 173-303-400(c)(3)(iii))

- a. Are dangerous wastes disposed of via underground injection? \_\_\_\_\_

If so, specify: \_\_\_\_\_

- b. Is the owner/operator familiar with the requirements set forth in RCRA 265.340 and Chapter 90.45 RCW, Water Pollution Control Act? \_\_\_\_\_

Comments: \_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_